



1 and substance containing a detectable amount of methamphetamine, a
2 Schedule II controlled substance.

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1 COUNT TWO

2 [18 U.S.C. § 924(c)(1)(A)(i)]

3 On or about December 9, 2022, in San Bernardino County, within
4 the Central District of California, defendant ROBERTO COVARRUBIA
5 RAMOS knowingly carried a firearm, namely, a Beretta, model APX, 9mm
6 caliber semi-automatic pistol, bearing serial number A045053X, during
7 and in relation to, and possessed such firearm in furtherance of, a
8 drug trafficking crime, namely, Possession with Intent to Distribute
9 Methamphetamine, in violation of Title 21, United States Code,
10 Sections 841(a)(1), (b)(1)(B)(viii), as charged in Count One of this
11 Indictment.

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1 COUNT THREE

2 [18 U.S.C. § 922(g)(1)]

3 On or about December 9, 2022, in San Bernardino County, within
4 the Central District of California, defendant ROBERTO COVARRUBIA
5 RAMOS knowingly possessed the following firearm and ammunition, each
6 in and affecting interstate and foreign commerce:

7 1. a Beretta APX, 9mm caliber semi-automatic pistol, bearing
8 serial number A045053X;

9 2. five rounds of Cascade Cartridge Inc. 9mm Luger caliber
10 ammunition;

11 3. four rounds of Winchester 9mm Luger caliber ammunition;

12 4. two rounds of Federal Cartridge Company 9mm Luger caliber
13 ammunition;

14 5. one round of Fiocchi 9mm Luger caliber ammunition; and

15 6. one round of Remington Peters 9mm Luger caliber ammunition.

16 Defendant RAMOS possessed such firearm and ammunition knowing
17 that he had previously been convicted of at least one of the
18 following felony crimes, each punishable by a term of imprisonment
19 exceeding one year:

20 1. Transportation or Sale of a Controlled Substance, in
21 violation of California Health and Safety Code Section 11352(a), in
22 the Superior Court for the State of California, County of San
23 Bernardino, case number FSB705264, on or about March 3, 2008;

24 2. Assault with a Deadly Weapon Other Than a Firearm, in
25 violation of California Penal Code Section 245(a)(1), in the Superior
Court for the State of California, County of San Bernardino, case
number FSB1002994, on or about November 17, 2010;

1 3. Vehicle Theft, in violation of California Vehicle Code
2 Section 10851(a), in the Superior Court for the State of California,
3 County of San Bernardino, case number FSB1302271, on or about July 2,
4 2013;

5 4. Shooting at an Inhabited Dwelling or Occupied Vehicle, in
6 violation of California Penal Code Section 246, in the Superior Court
7 for the State of California, County of San Bernardino, case number
8 FSB1405263, on or about January 23, 2015; and

9 5. Evading a Peace Officer with Wanton Disregard for Safety,
10 in violation of California Vehicle Code Section 2800.2(a), in the
11 Superior Court for the State of California, County of San Bernardino,
12 case number FSB17004781, on or about April 2, 2019.

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1 FORFEITURE ALLEGATION

2 [21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Section 853, Title 18, United States Code,
7 Section 924, and Title 28, United States Code, Section 2461(c), in
8 the event of the defendant's conviction of the offenses set forth in
9 any of Counts One through Three of this Indictment.

10 2. The defendant, if so convicted, shall forfeit to the United
11 States of America the following:

12 (a) All right, title and interest in any and all property,
13 real or personal, constituting or derived from, any proceeds which
14 the defendant obtained, directly or indirectly, from any such
15 offense;

16 (b) All right, title and interest in any and all property,
17 real or personal, used, or intended to be used, in any manner or
18 part, to commit, or to facilitate the commission of any such offense;

19 (c) All right, title, and interest in any firearm or
20 ammunition involved in or used in any such offense; and

21 (d) To the extent such property is not available for
22 forfeiture, a sum of money equal to the total value of the property
23 described in subparagraphs (a), (b), and (c).

24 3. Pursuant to Title 21, United States Code, Section 853(p),
25 the defendant, if so convicted, shall forfeit substitute property if,
26 by any act or omission of the defendant, the property described in
27 the preceding paragraph, or any portion thereof: (a) cannot be
28 located upon the exercise of due diligence; (b) has been transferred,

1 sold to, or deposited with a third party; (c) has been placed beyond
2 the jurisdiction of the court; (d) has been substantially diminished
3 in value; or (e) has been commingled with other property that cannot
4 be divided without difficulty.

5 A TRUE BILL
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7 /S/
8 Foreperson

9 E. MARTIN ESTRADA
10 United States Attorney

11 MACK E. JENKINS
12 Assistant United States Attorney
Chief, Criminal Division

13 *Christina Shug for SMG*

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